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VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square
New York, New York 10007

September 21, 2022

USDC SDNY
DOCUMENT
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Re: Zhengjian Li v. Jaddou, et al., No. 22 Civ. 6610 (VEC)

Dear Honorable Judge Caproni:

MEMO ENDORSED

Alexandre Law Firm, P.C., represents Plaintiff Zhengjian Li in the above-referenced action.

Counsel for Plaintiff humbly requests that this Honorable Court permanently seal, and allow Counsel to file the redacted version of SDNY CM/ECF **Docket Entry # 2**, "COMPLAINT IN THE NATURE OF MANDAMUS against Ur Mendoza Jaddou, Alejandro Mayorkas, Patricia A. Menges, Tracy Renaud, U.S. Citizenship and Immigration Services, U.S. Department of Homeland Security, Michael Valverde (Filing Fee \$ 402.00, Receipt Number ANYSDC-26501399). Document filed by Zhengjian Li. (Attachments: # 1 Exhibit Mandamus Exhibits).(Alexandre, Felipe) (Entered: 08/03/2022)".

Counsel respectfully requests that the Court also permanently seal the Attachments to **Docket Entry # 2**, "Attachments: # 1 Exhibit Mandamus Exhibits".

Counsel for Plaintiff inadvertently failed to file a redacted version of Docket Entry # 2, including attachments, pursuant to Rule 5.2(a) of the Federal Rules of Civil Procedure. Counsel for Plaintiff only recently became aware of this error. The filings include personal identifiers, such as dates of birth and social security numbers. A grant of this motion would allow Plaintiff's counsel to file a redacted version of the Complaint and Exhibits from Docket Entry # 2 in compliance with the rules. Plaintiff's counsel apologizes to the Court for above-mentioned oversight.

This is the first such request made by Plaintiff's counsel in the above-captioned matter. Defendants' Counsel consents to this request.

We thank the Court for its consideration of this letter.

Application GRANTED.

SO ORDERED.



09/22/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Felipe Alexandre

Felipe Alexandre, Esq.

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